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July 2, 2007

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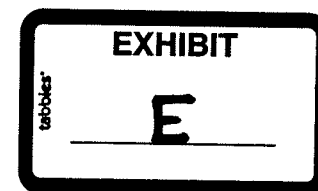
To all Counsel:
Via E-mail

Re: State of Oklahoma v. Tyson Foods, et.al
Case Number: 05-CV-325 GKF (SAJ)

Dear Counsel:

The State is providing the following for your copying and inspection. The State will provide you access to these databases and will have technical personnel on hand to help with your search. The State's production of July 2, 2007 contains the following:

1. **Oklahoma Secretary of the Environment**
Electronic Files and Reports (Reports, drafts, spreadsheets and PDF documents)
2. **Oklahoma Department of Agriculture, Food and Forestry**
(Grower, Complaints and Applicator Microsoft Access Databases)
3. **Oklahoma Conservation Commission**
GIS file (standard ARC viewer)
4. **Oklahoma Scenic Rivers**
Electronic Files, Reports and E-Mails (those E-mails identified and reviewed for privilege and responsiveness to date)
5. **Oklahoma Department of Environmental Quality**
Aquarius Database, Bacti Database, FishCom Database, Pesticide-Metals Database, ArkOK P Loading Excel spreadsheets. See attached instructions for accessing the Aquarius and Bacti databases.
6. **Oklahoma Water Resources Board**
Electronic Files and Reports
7. A list of all publicly available information on State websites and the ESI contained thereon.



July 2, 2007
Page 2

Due to concerns regarding the accessibility of the databases for OWRB (ORACLE) and OCC (SQL 7), those will be made available for your inspection at the respective agencies at a mutually agreeable time. Further attached to this letter are the addresses for publicly available information upon which the Plaintiffs will rely or which are responsive to the production requests by the Poultry Integrator Defendants.

The other ESI production will be produced through RLS in Tulsa. The individual Poultry Integrator Defendants can make arrangements with RLS to provide as many copies of the State's ESI production as desired. Hard drives, some of which were too small for this production will be sent to RLS so that they are available to you. The contact information for RLS is (918) 583-3353. Should you have any difficulties with this arrangement please contact Louis Bullock or Richard Garren.

If for any reason you cannot access any file or run any databases the State is more than willing to work with you in order so that you may properly access these databases. The State is continuing to identify and review for privilege and responsiveness ESI at these agencies and the remaining agencies. The State will supplement its production as documents are identified and reviewed.

Yours very truly,

**RIGGS, ABNEY, NEAL TURPEN,
ORBISON & LEWIS, P.C.**


Richard Garren

Agency	Document Title	Document Type	Date	Online Location
DEQ	Blue Green Algae	Fact Sheet	9/31/06	http://www.deq.state.ok.us/factsheets/customer/BlueGreenFS.pdf
	Swimming in Oklahoma's Lakes, Rivers and Stream	Fact Sheet	8/02	http://www.deq.state.ok.us/factsheets/water/swimming.pdf
	Trihalomethane (THM)	Fact Sheet	2/17/05	http://www.deq.state.ok.us/factsheets/water/THMfactsheet.pdf
	2002 Continuing Planning Process	Publication	11/1/02	http://www.deq.state.ok.us/WQDnew/pubs/2002_cpp_final.pdf
	Oklahoma TMDL Program	Publication	10/12/05	http://www.deq.state.ok.us/pubs/wqd/TMDLpamphlet.pdf
	Oklahoma Total Maximum Daily Load Practitioner's Guide	Publication	Undated	http://www.deq.state.ok.us/pubs/wqd/TMDLguide.pdf
	State of Oklahoma Unified Watershed Assessment Final Report	Publication	10/1/98	http://www.deq.state.ok.us/WQDnew/pubs/uwa_final.pdf
	Watershed Restoration Action Strategy (WRAS) for the Illinois River/Baron Fork Watershed (OCC)	Publication	7/1/99	http://www.deq.state.ok.us/WQDnew/pubs/illinois_river_wras_final.pdf
	Draft 2006 Continuing Planning Process and Public Notice	Publication	6/1/07	http://www.deq.state.ok.us/WQDnew/pubs.html
	2004 Oklahoma Integrated Water Quality Assessment Report	Publication	2004	http://www.deq.state.ok.us/WQDnew/305b_303d/2004_integrated_report_final.pdf
	2006 DRAFT Integrated Water Quality Assessment Report and Public Notice with Description of 2004 Approval	Publication	6/6/07	http://www.deq.state.ok.us/WQDnew/305b_303d/index.html
	305(b) Report Archives	Publications	2002, 2000, 1998	http://www.deq.state.ok.us/WQDnew/305b_303d/305b_archive.html
	2004 303(d) List	Publication	2004	http://www.deq.state.ok.us/WQDnew/305b_303d/index.html

	(Integrated Report Appendix C - Category 5 Waterbodies)			
	DEQ GIS Data Viewer		N/A	http://maps.scigis.com/deq%5Fwq/
	DEQ Fish Consumption Guidance Mercury Advisory Fact Sheet	Fact Sheet	Undated	http://www.deq.state.ok.us/factsheets/land/fishmerc.pdf
	DEQ Safe Drinking Water Information System	Database	N/A	http://sdwis.deq.state.ok.us/
OWRB	Water Quality Standards, Implementation and Revisions	Rules and Rulemaking Documents	N/A	http://www.owrb.ok.gov/quality/standards/standards.php
	Standard Operating Procedure for Streams Field Sampling	Publication	4/27/04	http://www.owrb.ok.gov/quality/monitoring/bump/pdf_bump/SOPs_for_streams/bump.pdf
	2001-2005 Beneficial Use Monitoring Reports	Reports	2001-2005	http://www.owrb.ok.gov/quality/monitoring/bump.php
	Data and Maps of Major Aquifers, Reported Well Logs, Locations of BUMP Lake and Stream Sites, and Nutrient Limited Watersheds	Shapefiles and Metadata	N/A	http://www.owrb.ok.gov/maps/data/owrbdata.php
	Water Well Records	Database	N/A	http://www.owrb.state.ok.us/wd/search/search.php
	Rural Water Systems of Oklahoma	Maps and GIS Coverage	N/A	http://www.owrb.ok.gov/maps/maps2/ruralwater.php
	Water Information Mapping System	Mapping and GIS Coverage (Wells and Water Quality)	N/A	http://www.owrb.ok.gov/maps/server/wims.php
	Arkansas-Oklahoma Arkansas River Compact	Report	2001	http://www.owrb.ok.gov/util/rules/legal_docs.php

	Commission Annual Report, October 2001			
	Oklahoma Water Watch Greater Tenkiller Area Association & Illinois River OWW Chapters 1997-2002 Data Summary	Report	Undated	http://www.owrb.ok.gov/studies/reports/reports_pdf/tenkiller_report.pdf
	Phase 1 Diagnostic and Feasibility Study on Tenkiller Lake--Final Report-(OSU)	Report	6/96	http://www.owrb.ok.gov/studies/reports/reports_pdf/TenkillerPhase1.pdf
	Joint Arkansas/Oklahoma Scenic River Monitoring Proposal	Proposal	9/22/04	http://www.owrb.ok.gov/studies/reports/reports_pdf/Scenic_River_Monitoring_Propos
	Water Quality Monitoring Report for the Illinois River Basin--Arkansas-Oklahoma Compact	Report	2003	http://www.owrb.ok.gov/studies/reports/reports_pdf/ArkOKCompactRpt03.pdf
	Statewide Groundwater Vulnerability Map of Oklahoma	Report and Map	1/99	http://www.owrb.ok.gov/studies/reports/gwvulnerability/gwvulnerability.php
	Hydrogeologic Report of the Northeastern Oklahoma Minor Groundwater Basin and the Neosho River Minor Groundwater Basins	Report	6/97	http://www.owrb.ok.gov/studies/reports/reports_pdf/TR97_3%20NE%20OK%20Minor%20Neosho%20River%20GW%20Basins.pdf
	Groundwater Quality Data for Oklahoma: 1986-1988	Report	6/89	http://www.owrb.ok.gov/studies/reports/reports_pdf/tr89_2_gw_data.pdf
	Board Meeting Agendas and Minutes		1/14/03 through 7/10/07	http://www.owrb.ok.gov/news/meetings/board/board-mtgs.php

OSE	S.B. 972 Reports	Reports with Maps and Data on Pollution Sources	2002 through 2006	http://www.environment.ok.gov/documents.html#972
	Eutrophic Lakes of Oklahoma	Table	Undated	http://www.environment.ok.gov/documents/Other/EutrophicLakesOfOklahoma.pdf
	Governor Frank Keating's Animal Waste & Water Quality Protection Task Force – Final Report	Report	12/1/97	http://www.environment.ok.gov/documents/Other/AWWQPTF_FinalReport.pdf
	Disbursement of Federal Funds Pursuant to the Federal Water Pollution Control Act 2005 Update	Report	11/1/05	http://www.environment.ok.gov/documents/CWA/2005CWA_Update.pdf
	Disbursement of Federal Funds Pursuant to the Federal Water Pollution Control Act 2004 Update	Report	11/1/04	http://www.environment.ok.gov/documents/CWA/2004CWA_Update.pdf
	Disbursement of Federal Funds Pursuant to the Federal Water Pollution Control Act 2003 Annual Report	Report	11/1/03	http://www.environment.ok.gov/documents/CWA/2003CWA_Initial.pdf
	Arkansas Oklahoma Statement of Joint Principles and Actions to Improve Scenic Rivers	Statement	12/18/03	http://www.environment.ok.gov/documents/News/ArkOk_FinalStatement_18Dec03.pdf
ODWC	Digital Wildlife Management Area Maps	GIS	N/A	http://www.wildlifedepartment.com/wmas.htm
	Electrofishing Surveys	Reports	1993-2006	http://www.wildlifedepartment.com/electrofishing2.htm
	Oklahoma Trout License Holder Survey	Report	2002	http://www.wildlifedepartment.com/trout_survey_2002.htm
	Illinois River	Project	N/A	http://www.wildlifedepartment.com/streams/Projects%201.htm

	Habitat Enhancement Project	Summary		
	Department Secures River Front Property with First Legacy Permit Purchase	Press Release	9/15/06	http://www.wildlifedepartment.com/watts.htm
	Oklahoma Endangered and Threatened Species	List with link to Oklahoma Natural Heritage Inventory	Undated	http://www.wildlifedepartment.com/endanger2.htm http://www.biosurvey.ou.edu/download/heritage/countyp0503.pdf
OSRC	News Articles, Water Levels in Scenic Rivers, Newsletters and Announcements	Various	N/A	http://www.oklahomascenicrivers.net/index.asp
	Illinois River Map	Map	2003	http://www.oklahomascenicrivers.net/files/2004_floaters_guide_map.pdf
	2006 Floater's Guide	Brochure	2006	http://www.oklahomascenicrivers.net/files/2006_floaters_guide.pdf
	Meeting Agendas and Minutes (2002-2007), Commission Calendar, State Water Quality Calendar	Various	N/A	http://www.oklahomascenicrivers.net/events.asp
	Illinois River Management Plan	Report	1999	http://www.oklahomascenicrivers.net/programs.asp
	Illinois River Cleanup	Various	N/A	http://www.oklahomascenicrivers.net/cleanup.asp
	Announcements regarding Activities related to Scenic Rivers	Various	N/A	http://www.oklahomascenicrivers.net/archives.asp?type=announcements
ODAFF	Agricultural Environmental Management Services Homepage	Various CAFO and Poultry Program Descriptions, Forms and Publications	N/A	http://www.oda.state.ok.us/aems-home.htm
	Consumer Protection Services	Various Fertilizer,		http://www.oda.state.ok.us/cps-formshome.htm

	Homepage	Soil Amendment and Pesticide Program Descriptions, Forms and Publications		
OKCC	Information Technology Division Homepage	Description of GIS Programs with link to the Oklahoma Geographic Information Council and Oklahoma Data Warehouse and Mapper	N/A	http://www.ok.gov/okcc/Agency_Divisions/Information_Technology/ link to: http://www.okmaps.onenet.net/ link to: http://www.csa.ou.edu/
	Digital Orthophotography	Photographs	Various	http://www.ok.gov/okcc/Digital_Orthophotographs/index.html
	Water Quality Homepage	Description of Water Quality Programs	Various	http://www.ok.gov/okcc/Water_Quality/index.html
	Oklahoma's Nonpoint Source Pollution Program Annual Reports	Reports	2000 through 2006	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Annual_Reports/index.html
	Development of Guidelines for TMDLs with Nonpoint Source Components Using SWAT. Final Report. FY1999	Report	10/17/05	http://www.okcc.state.ok.us/WQ/WQ_reports/report0114.pdf
	Oklahoma's Nonpoint Source Management Program and Nonpoint Source Assessment Report 2000-2015	Report	Various	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Planning_Reports/index.html
	Demonstrating	Report	1994	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html

	BMP's to Protect Surface Water Quality from Land Application of Animal Wastes: Final Report. FY1994. <i>Eastern Oklahoma</i>			
	Watershed Protection Through Manure Marketing (Pilot Program). Final Report. FY1997. <i>Eastern Oklahoma</i>	Report	1997	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Environmentally Sound Grazing: Report on Nutrient Yield in Runoff from Rainfall Simulation Runs. FY1997	Report	1/8/02	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Small Farms Livestock Pollution Prevention. Final Report. FY1995	Report	1995	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Improving Water Quality Through Animal Waste Management. Final Report. FY1995	Report	1995	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Dairy Waste Management Implementation Project. FY1994	Report	1994	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Bank Stabilization thru Stream Restoration. FY1995	Report	1995	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Echota Bend Bank Stabilization Project. Implementation Report. FY1992	Report	1992	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Technical Assistance for the	Report	1993	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html

	Establishment and Maintenance of Riparian Corridors. Final Report. FY1993			
	Erosion Control and Abatement Practices for County Road Systems. Final Report. FY1995	Report	1995	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Farm and Ranch Wellhead and Ground Water Assessment Pilot Project. Final Report. 1998	Report	1/98	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Topic_Specific.html
	Basin-Wide Pollutant Inventory for the Illinois River Comprehensive Basin Management Program. Final Report	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html
	Illinois River and Baron Fork Watershed Implementation Project. Final Report. FY1999	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html
	Comprehensive Basin Management Plan for the Illinois River Basin in Oklahoma. 1999	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html
	Illinois River Watershed Implementation Plan: Peacheater Creek. Final Report. FY1996	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html
	Illinois River Watershed Monitoring Program - National	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html

	Monitoring Project. Calibration Report. FY 1996			
	Illinois River Watershed Monitoring Program - National Monitoring Project: Post-Implementation Monitoring Summary Report - Year 1 Preliminary Evaluation of Post-Implementation Monitoring. FY 2000	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html
	Illinois River Monitoring Program National Monitoring Project: Calibration Report. FY1996 Paired Watersheds	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html
	Institutionalization of Conservation District Nonpoint Source Pollution Programs of the Illinois River with Programs of the Oklahoma Scenic Rivers Commission. Final Report. FY1997	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html
	Water Quality Technical Assistance in the Illinois River Basin. Final Report. FY1992	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html
	Water Quality Division Success Stories (Beaty Creek)	Webpage with link	N/A	http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Success_Sto link to: http://www.epa.gov/nps/Success319/state/ok_beaty.htm
	Lake Eucha	Report		http://www.ok.gov/okcc/Agency_Divisions/Water_Quality_Division/WQ_Reports/WQ_Project_Reports/WQ_Reports:_Watershed_Specific.html

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